

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al. : Case No. C-1-02-467
Plaintiffs, :
v. : Judge Beckwith
AK STEEL CORPORATION : Magistrate Judge Hogan
Defendant. : DECLARATION OF
: MARY JANE PALMER NUNLIST

Mary Jane Palmer Nunlist truthfully declares that she is competent to testify if called and she further truthfully states of her own personal knowledge as follows.

1. I am the owner of Palmer Temps, Inc. ("Palmer Temps") in Middletown, Ohio.

The address for Palmer Temps is 4302 Roosevelt Boulevard, Middletown, Ohio 45044. This has been our address since 1988. Palmer Temps is in the staffing business. We provide temporary personnel for companies. We also assist companies with their direct hires.

2. AK Steel Corporation ("AK Steel") asked us to help it with its direct hires by accepting applications for its Labor Reserve jobs at our offices on Roosevelt Boulevard. It was our understanding that AK Steel needed some administrative help processing applications during this period. We performed this function for AK Steel for a period of time, completed this function prior to January 29, 2001, and have not performed it since.

3. Donald Edwards did not apply for any AK Steel position with us in August, 2001 or January, 2002. In fact, Palmer Temps was not accepting applications from anyone for any AK

Steel mill positions in August of 2001 or at any time since. We had stopped accepting AK Steel applications for its direct hires by this time. On September 10, 2006, Richard Nunlist of our organization, sent Rusty Johnson an e-mail confirming for him that we did not accept applications from Donald Edwards or anyone else for any AK Steel positions in August, 2001.

4. We have never administered any pre-employment test that AK Steel gives to applicants for hourly positions at AK Steel at our offices. We have never administered AK Steel's test to Donald Edwards.

5. Individuals who seek to register for employment with Palmer Temps are given Palmer Temps' own test/evaluation. This is not the AK Steel pre-employment test. We use our test/evaluation to measure skills and identify areas of strength and knowledge. This assists us in matching workers with the varied staffing needs of our clients. Our records show that Donald Edwards came in to register with Palmer Temps on January 29, 2001 and completed this registration on February 6, 2001. As part of this registration, he took the Palmer Temps test/evaluation at our Roosevelt Boulevard location.

I declare under penalty of perjury that the foregoing is true and accurate.

Signed this 14th day of May, 2007.



Mary Jane Palmer Nunlist